

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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CHERYL SAGATAW and  
DEANTHONY BARNES, *on behalf of  
themselves and a class of  
similarly-situated individuals,*

Plaintiffs,

vs.

MAYOR JACOB FREY, *in his  
individual and official capacity,*

Defendant.

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Civil Action No.  
0:24-cv-00001-ECT/TNL

**DECLARATION OF DEANTHONY  
BARNES IN SUPPORT OF  
COMPLAINT AND MOTION  
FOR TEMPORARY  
RESTRAINING ORDER**

**DECLARATION OF DEANTHONY F. BARNES**

I, DeAnthony F. Barnes, pursuant to 28 U.S.C. § 1746, declare as follows:

1. My name is DeAnthony F. Barnes and I am 35 years old.
2. Since 2011 I have been a part of many unhoused communities.
3. Starting in February 2023, however, I was housed at Avivo's tiny home village. The system there did not work well. It was nearly a year before I was even able to work with a case worker. I ended up being discharged from Avivo about a month ago and came to live at Camp Nenookaasi.
4. Camp Nenookaasi is an Indigenous-led healing camp. It is a tight-knit, family-based community. It is unlike any other camp I have ever been in. I've never participated in or lived at a camp that has such a coordination of care as they have here. The support and resources they have here are great. I've seen people go into housing, and it makes me feel like I can actually get help here and the direction that I need. The work that Nicole is doing is much appreciated. She gave me a chance here. I'm now looking at getting treatment and going into housing.
5. It makes me feel great to know that there's someone out there who still cares. It's often hard to trust people. It often feels like the system is designed to fail, people are pitted against each other to compete for resources, it creates division and distrust. It's like trying to build a bridge, but someone keeps trying to pull a leg out from under you, so you can't get it built.
6. It's a shame that I'm getting more resources and more help here than at Avivo. At Avivo, I watched people die. You see people stuck in their rooms getting high, because it's a get-high-friendly place where people use for days where pretty much all the staff does is room-checks. Avivo was taking \$1200 a month out of my General Assistance (GA), and I was there almost a year, but they kicked me out and I had nothing. Here, I've been here 30 days and already have more help than I had at Avivo in a year, and because of that I've had more success here in 30 days than I had at Avivo in a year.
7. At Camp Nenookaasi, I am making efforts towards sobriety and getting into treatment. I'm also trying to help my girlfriend get to that place where she is ready to get into treatment as well. Camp Nenookaasi is a place that is saving lives. It's a place that is going to help me get the help I need. But Camp is not just helping me—it's helping all of the residents here. This place is a benefit not just to the unhoused community, but the whole community because it is helping people get the help they need and access the resources and support we all need.


8. Destroying Camp Nenookaasi isn't going to get rid of the problem, it's just going to make the problems move to a new location. What is the plan, what is the City going to do, trespass us from the entire City?
9. I'm not just thinking about myself. I'm thinking about the broader community and the neighborhood residents too. They don't deserve to be dealing with these problems. But by destroying Camp Nenookaasi, the City is just going to move the problem instead of dealing with it and really helping people. We need a place where people can rest, shower up, get clean clothes, get housing, get detox, get Narcan, a place to get out of the heat in the summer and cold in the winter.
10. This is a ceremonial camp as well. I've observed ceremonial fires for people who have passed on, people gathered around the campfire and drumming, I've seen smudging. Upfront at the entrance to the Camp there is medicine set up to keep spirits away from the entrance. I myself have Christian beliefs, and I'm also a deeply spiritual person interested in universal truths who has studied history and philosophy. These things are different from my faith, but I've witnessed these ceremonies and it's a beautiful thing.
11. Being here at Camp Nenookaasi puts me in a mental space of thinking about the ancestors and what they went through, dealing with colonists and displacement. I studied the Oklahoma project and how they did the Indigenous people. And this is the same American government we're dealing with, with an agenda against us.
12. Camp Nenookaasi is a unified community. Even people who are from different neighborhoods, even with different gang affiliations, are able to live here as brothers. That's one thing that is so important that Camp Nenookaasi has done, brought people together in a way that departs even from extreme divisions—it's about survival, brotherhood, and #homelesslivesmatter.
13. A lot of the folks here now at Camp Nenookaasi are folks I've known from prior encampments that were evicted—North Loop, Lake Street, 30<sup>th</sup> Street. I myself have been evicted more times than I can count, and I know the same is true for many people here. Just in the last couple years, I've been evicted 6-7 times. And every time I lost everything—things that were donated, things that my family contributed, and all that is lost over and over again. All you can take with you during an eviction is one armload. I've lost pictures of my children, I've lost my generator, I've lost laptops full of music that I've written, produced, recorded myself. I've lost clothes, numerous electronics, equipment and tools, my birth certificate and identification, and my girlfriend's birth certificate and identification.
14. One time I was able to be prepared for the eviction, I was able to be all packed and ready to go and the last thing for me to do was fold my tent up. But Minneapolis Police

Department (MPD) stuck a knife into my tent and cut right into it. The reality is, we live out here. We have a whole life, and the evictions and sweeps mean you lose all of it.

15. Here at Camp Nenookaasi, I stay in a tent. It isn't heated, but I stay warm by gathering around the fires or in another yurt that is heated. I do have a heater in my tent, but it's a propane heater and we aren't getting propane donations right now. If I'm evicted from Camp Nenookaasi I'm really worried about how my girlfriend and I will survive the winter.
16. The City claims we should go to a shelter, but I've gone through the shelter experience and really tried to make it work. It's just not realistic, it's really hard. First of all, it just doesn't work for everyone—it doesn't work for couples, it doesn't work for addicts. They split up couples. They are intolerant of people struggling with addiction. They require you to follow curfews and then you're woken up at 7am and pushed back out into the streets, so you're out in the cold anyways. That's not a real housing solution. Even more than that, there's also just not always shelter beds available. It's hard to call and figure out where there's a bed, it's hard to get into more permanent places like Avivo. The system is just not reliable or stable. There's got to be a better system, a better solution to getting shelter and housing resources to the people. That's exactly what Camp Nenookaasi is and what Nicole is doing.
17. If the eviction happens, many people here will be reset and go back to how they were before. Camp Nenookaasi has enabled people to advance their thought process, and be able to think about things beyond "How am I going to stay warm? How am I going to eat?" and advance to "How am I going to get into housing" or "How am I going to get clean?" That's all because of the community and care and simple things like reliable heat.
18. In my tent, I've got my music, musical instruments and a recording microphone. I keep my religious scriptures in my tent. I keep my winter clothes, my sleeping bag and bedding, my generator. If Camp Nenookaasi is evicted and destroyed, I am going to lose my belongings. I simply don't have the ability to pack up and carry and drag around all of my belongings—how can you get on a bus with everything you live with? You can't.

I declare under penalty of perjury that this declaration is true and correct.

Executed on January 1, 2024, in the City of Minneapolis, County of Hennepin, State of Minnesota, Treaty-Ceded Territory of the Dakota peoples.



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DeAnthony F. Barnes